

CAROLINE TURCO, OSB 083813
Senior Deputy City Attorney
caroline.turco@portlandoregon.gov
Portland City Attorney's Office
1221 SW 4th Ave., Rm. 430
Portland, OR 97204
Telephone: (503) 823-4047
Facsimile: (503) 823-3089
Of Attorneys for Defendant City of Portland

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

TED TIMMONS,

3:22-cv-01235-SB

PLAINTIFF,

DECLARATION OF CAROLINE TURCO

v.

**CITY OF PORTLAND, and BRYCE
ASKELSON,**

DEFENDANTS.

I, Caroline Turco, being first duly sworn, do depose and say:

1. I am the attorney representing City of Portland in the above-entitled matter and I make this declaration in support of defendant's request for an extension of time in which to file an Answer or other responsive document.

2. Plaintiff Ted Timmons filed this case in the United States District Court for the District of Oregon on August 22, 2022.

3. Defendant City of Portland was served with the Summons and Complaint on September 27, 2022.

4. Defendant City of Portland's response to plaintiff's Complaint is due October 18, 2022. In order to conduct a background investigation, contact and review the lawsuit with the various named defendants and prepare and file a meaningful response to plaintiff's Complaint,

defendant City of Portland requests a 30-day extension of time, up to and including November 17, 2022 in which to file an Answer or other responsive document.

5. Plaintiff's attorneys, Franz Bruggemeier, Juan C. Chavez and Jonathan Gersten, have no objection to this request for an extension of time.

6. This motion is presented in good faith and not for reasons of delay.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: October 14, 2022

/s/ Caroline Turco
Caroline Turco